

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

EPIC SYSTEMS CORPORATION, a
Wisconsin Corporation,

Plaintiff,

Case No. 14-CV-748

v.

TATA CONSULTANCY SERVICES
LIMITED, an Indian Corporation; and TATA
AMERICA INTERNATIONAL
CORPORATION (dba TCS AMERICA), a
New York Corporation,

Defendants.

EPIC'S APPLICATION FOR ATTORNEYS' FEES AND COSTS

Pursuant to the Court's April 16, 2016 order, along with the Court's statements on April 15, 2016, Epic hereby submits this application for attorneys' fees and costs, along with copies of the invoices it received from Jenner & Block LLP containing time entries related to Epic's "discovery efforts" in this case. *See* Dkt. No. 875; Dkt. No. 898 at 156:12-18, 157:10-14.¹ In addition, because Wisconsin's Civil Theft Statute and Uniform Trade Secrets Act provide independent statutory bases that permit Epic to recover all of its attorneys' fees and costs, Epic seeks recovery on those bases as well. *See* Wis. Stat. § 895.446(3)(b); Wis. Stat. § 134.90(4)(c).

Epic's application for attorneys' fees and costs is based on this application, the concurrently-submitted invoices and memorandum in support of Epic's application for attorneys' fees and costs, Epic's motion for sanctions and memorandum in support thereof (Dkt. Nos. 521,

¹ By submitting copies of the invoices it received from Jenner & Block, Epic does not intend to and is not waiving attorney client privilege or work product protection.

531), all of the evidence in the record related to TCS's discovery conduct in this case, and any further evidence or argument permitted by the Court in writing or at a hearing on this matter.

Dated: May 13, 2016

/s/ Rick Richmond

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